

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

LUCRETIA IRIS JAMES,

Defendant.

NO. CR 08 0244RSL-003

MOTION TO AUTHORIZE TRAVEL
OUTSIDE THE UNITED STATES

Noted for: November 30, 2012

Comes now the defendant, Lucretia James, by and through her counsel of record, Jon R. Zulauf and hereby moves this Court for an Order authorizing her to travel outside the United States.

Lucretia James was arrested in 2008 in connection a drug conspiracy. At the time of her involvement with the drug conspiracy she was unemployed, her children were

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1 hungry and their father paid no child support. She had been physically abused. In that
2 setting she made a terrible decision to carry drugs.

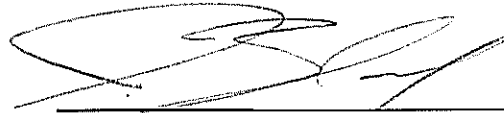
3 This Court sentenced her to serve time in confinement and placed her on five years
4 of probation.

5 As of this date, she has spent approximately three and one-half years on probation
6 with no significant infractions and no additional criminal offenses. She is working as a
7 supervisor for RBC Construction.

8 Lucretia's sister, Taress Alexis, will be married at a ceremony in Kingston, Jamaica
9 over the Christmas Holidays. Lucretia hopes to attend the wedding. She is hereby
10 petitioning the court for authorization to travel to Jamaica on December 22 and returning
11 to the United States on January 5.

12 Counsel contacted Cassy Lerch, Lucretia's probation officer, on November 19,
13 2012. Ms. Lerch indicated she had no objection to the proposed authorization to travel
14 to Jamaica.

15 Respectfully submitted this 19th day of November, 2012.

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19 Jon R. Zulauf WSBA # 6936
20 Attorney For Lucretia James

Certificate of Service

I hereby certify that on November 20, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorney of record for the government. I hereby certify that I have served the attorneys of record for the government that are non CM/ECF participants via United States Mail, postage prepaid.

/s/Darlene McLean
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